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7 **BEFORE THE**
8 **BOARD OF REGISTERED NURSING**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2011-993**

12 **LAURA CATHARINE WAHPEPAH**
13 **aka Laura Catharine Bruce**
14 **4516 Fran Way**
15 **Richmond, CA 94803**

A C C U S A T I O N

16 **Registered Nurse License No. RN 557888**
17 **Public Health Nurse Certificate No. PHN 61564**
18 **Nurse Practitioner Certificate No. NP 12723**
19 **Nurse Practitioner Furnishing No. NPF 12723**

20 Respondent.

21 Complainant alleges:

22 **PARTIES**

23 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
24 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
25 Consumer Affairs.

26 2. On or about July 30, 1999, the Board of Registered Nursing issued Registered Nurse
27 License Number RN 557888 to Laura Catharine Wahpepah, aka Laura Catharine Bruce
28 (Respondent). The Registered Nurse License was in full force and effect at all times relevant to
the charges brought herein and will expire on February 28, 2013, unless renewed.

3. On or about December 10, 1999, the Board of Registered Nursing issued Public
Health Nurse Certificate No. PHN 61564 to Laura Catharine Wahpepah, aka Laura Catharine

1 Bruce (Respondent). The Public Health Nurse Certificate was in full force and effect at all times
2 relevant to the charges brought herein and will expire on February 28, 2013, unless renewed.

3 4. On or about August 3, 2001, the Board of Registered Nursing issued Nurse
4 Practitioner Certificate No. NP 12723 to Laura Catharine Wahpepah, aka Laura Catharine Bruce
5 (Respondent). The Nurse Practitioner certificate was in full force and effect at all times relevant
6 to the charges brought herein and will expire on February 28, 2013, unless renewed.

7 5. On or about April 8, 2002, the Board of Registered Nursing issued Nurse Practitioner
8 Furnishing No. NPF 12723 to Laura Catharine Wahpepah, aka Laura Catharine Bruce
9 (Respondent). The Nurse Practitioner Furnishing Number was in full force and effect at all times
10 relevant to the charges brought herein and will expire on February 28, 2013, unless renewed.

11 JURISDICTION

12 6. This Accusation is brought before the Board of Registered Nursing (Board),
13 Department of Consumer Affairs, under the authority of the following laws. All section
14 references are to the Business and Professions Code unless otherwise indicated.

15 7. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part,
16 that the Board may discipline any licensee, including a licensee holding a temporary or an
17 inactive license, for any reason provided in Article 3 (commencing with section 2750) of the
18 Nursing Practice Act.

19 8. Section 2764 of the Code provides, in pertinent part, that the expiration of a license
20 shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the
21 licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the
22 Code, the Board may renew an expired license at any time within eight years after the expiration.

23 STATUTORY AND REGULATORY PROVISIONS

24 9. Section 2052 of the Code states:

25 (a) Notwithstanding Section 146, any person who practices or attempts to practice, or who
26 advertises or holds himself or herself out as practicing, any system or mode of treating the sick or
27 afflicted in this state, or who diagnoses, treats, operates for, or prescribes for any ailment,
28 blemish, deformity, disease, disfigurement, disorder, injury, or other physical or mental condition

1 of any person, without having at the time of so doing a valid, unrevoked, or unsuspended
2 certificate [to practice medicine] or without being authorized to perform the act pursuant to a
3 certificate obtained in accordance with some other provision of law is guilty of a public offense,
4 punishable by a fine not exceeding ten thousand dollars (\$10,000), by imprisonment in the state
5 prison, by imprisonment in a county jail not exceeding one year, or by both the fine and either
6 imprisonment.

7 (b) Any person who conspires with or aids or abets another to commit any act described in
8 subdivision (a) is guilty of a public offense, subject to the punishment described in that
9 subdivision.

10 (c) The remedy provided in this section shall not preclude any other remedy provided by
11 law.

12 10. Section **2726** of the Code states:

13 Except as otherwise provided herein, this chapter confers no authority to practice medicine
14 or surgery.

15 11. Section **2761** of the Code states, in pertinent part:

16 The board may take disciplinary action against a certified or licensed nurse or deny an
17 application for a certificate or license for any of the following:

18 (a) Unprofessional conduct, which includes, but is not limited to, the following:

19 (1) Incompetence, or gross negligence in carrying out usual certified or licensed nursing
20 functions.

21 ...

22 (d) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the
23 violating of, or conspiring to violate any provision or term of this chapter or regulations adopted
24 pursuant to it.

25 ...

26 (h) Impersonating another certified or licensed practitioner, or permitting or allowing
27 another person to use his or her certificate or license for the purpose of nursing the sick or
28 afflicted.

12. Section 2762 of the Code states, in pertinent part:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or administer to another, any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as defined in Section 4022.

• • •

13. Section **2836.1** of the Code states:

Neither this chapter nor any other provision of law shall be construed to prohibit a nurse practitioner from furnishing or ordering drugs or devices when all of the following apply:

(a) The drugs or devices are furnished or ordered by a nurse practitioner in accordance with standardized procedures or protocols developed by the nurse practitioner and the supervising physician and surgeon when the drugs or devices furnished or ordered are consistent with the practitioner's educational preparation or for which clinical competency has been established and maintained.

(b) The nurse practitioner is functioning pursuant to standardized procedure, as defined by Section 2725, or protocol. The standardized procedure or protocol shall be developed and approved by the supervising physician and surgeon, the nurse practitioner, and the facility administrator or the designee.

(c)(1) The standardized procedure or protocol covering the furnishing of drugs or devices shall specify which nurse practitioners may furnish or order drugs or devices, which drugs or devices may be furnished or ordered, under what circumstances, the extent of physician and surgeon supervision, the method of periodic review of the nurse practitioner's competence, including peer review, and review of the provisions of the standardized procedure.

(2) In addition to the requirements in paragraph (1), for Schedule II controlled substance

1 protocols, the provision for furnishing Schedule II controlled substances shall address the
2 diagnosis of the illness, injury, or condition for which the Schedule II controlled substance is to
3 be furnished.

4 (d) The furnishing or ordering of drugs or devices by a nurse practitioner occurs under
5 physician and surgeon supervision. Physician and surgeon supervision shall not be construed to
6 require the physical presence of the physician, but does include (1) collaboration on the
7 development of the standardized procedure, (2) approval of the standardized procedure, and (3)
8 availability by telephonic contact at the time of patient examination by the nurse practitioner.

9 (e) For purposes of this section, no physician and surgeon shall supervise more than four
10 nurse practitioners at one time.

11 (f)(1) Drugs or devices furnished or ordered by a nurse practitioner may include Schedule II
12 through Schedule V controlled substances under the California Uniform Controlled Substances
13 Act (Division 10 (commencing with Section 11000) of the Health and Safety Code) and shall be
14 further limited to those drugs agreed upon by the nurse practitioner and physician and surgeon
15 and specified in the standardized procedure.

16 (2) When Schedule II or III controlled substances, as defined in Sections 11055 and 11056,
17 respectively, of the Health and Safety Code, are furnished or ordered by a nurse practitioner, the
18 controlled substances shall be furnished or ordered in accordance with a patient-specific protocol
19 approved by the treating or supervising physician. A copy of the section of the nurse practitioner's
20 standardized procedure relating to controlled substances shall be provided, upon request, to any
21 licensed pharmacist who dispenses drugs or devices, when there is uncertainty about the nurse
22 practitioner furnishing the order.

23 (g)(1) The board has certified in accordance with Section 2836.3 that the nurse practitioner
24 has satisfactorily completed (1) at least six month's physician and surgeon-supervised experience
25 in the furnishing or ordering of drugs or devices and (2) a course in pharmacology covering the
26 drugs or devices to be furnished or ordered under this section.

27 (2) Nurse practitioners who are certified by the board and hold an active furnishing number,
28 who are authorized through standardized procedures or protocols to furnish Schedule II controlled

1 substances, and who are registered with the United States Drug Enforcement Administration,
2 shall complete, as part of their continuing education requirements, a course including Schedule II
3 controlled substances based on the standards developed by the board. The board shall establish
4 the requirements for satisfactory completion of this subdivision.

5 (h) Use of the term "furnishing" in this section, in health facilities defined in Section 1250
6 of the Health and Safety Code, shall include (1) the ordering of a drug or device in accordance
7 with the standardized procedure and (2) transmitting an order of a supervising physician and
8 surgeon.

9 (i) "Drug order" or "order" for purposes of this section means an order for medication
10 which is dispensed to or for an ultimate user, issued by a nurse practitioner as an individual
11 practitioner, within the meaning of Section 1306.02 of Title 21 of the Code of Federal
12 Regulations. Notwithstanding any other provision of law, (1) a drug order issued pursuant to this
13 section shall be treated in the same manner as a prescription of the supervising physician; (2) all
14 references to "prescription" in this code and the Health and Safety Code shall include drug orders
15 issued by nurse practitioners; and (3) the signature of a nurse practitioner on a drug order issued
16 in accordance with this section shall be deemed to be the signature of a prescriber for purposes of
17 this code and the Health and Safety Code.

18 14. Section **2836.2** of the Code states:

19 Furnishing or ordering of drugs or devices by nurse practitioners is defined to mean the act
20 of making a pharmaceutical agent or agents available to the patient in strict accordance with a
21 standardized procedure. All nurse practitioners who are authorized pursuant to Section 2831.1 to
22 furnish or issue drug orders for controlled substances shall register with the United States Drug
23 Enforcement Administration.

24 15. Section **2836.3** of the Code states:

25 (a) The furnishing of drugs or devices by nurse practitioners is conditional on issuance by
26 the board of a number to the nurse applicant who has successfully completed the requirements of
27 subdivision (g) of Section 2836.1. The number shall be included on all transmittals of orders for
28 drugs or devices by the nurse practitioner. The board shall make the list of numbers issued

1 available to the Board of Pharmacy. The board may charge the applicant a fee to cover all
2 necessary costs to implement this section.

3 (b) The number shall be renewable at the time of the applicant's registered nurse license
4 renewal.

5 (c) The board may revoke, suspend, or deny issuance of the numbers for incompetence or
6 gross negligence in the performance of functions specified in Sections 2836.1 and 2836.2.

7 16. California Code of Regulations, title 16, section **1442**, states:

8 As used in Section 2761 of the code, 'gross negligence' includes an extreme departure from
9 the standard of care which, under similar circumstances, would have ordinarily been exercised by
10 a competent registered nurse. Such an extreme departure means the repeated failure to provide
11 nursing care as required or failure to provide care or to exercise ordinary precaution in a single
12 situation which the nurse knew, or should have known, could have jeopardized the client's health
13 or life.

14 17. California Code of Regulations, title 16, section **1443**, states:

15 As used in Section 2761 of the code, 'incompetence' means the lack of possession of or the
16 failure to exercise that degree of learning, skill, care and experience ordinarily possessed and
17 exercised by a competent registered nurse as described in Section 1443.5.

18 18. California Code of Regulations, title 16, section **1443.5** states:

19 A registered nurse shall be considered to be competent when he/she consistently
20 demonstrates the ability to transfer scientific knowledge from social, biological and physical
21 sciences in applying the nursing process, as follows:

22 (1) Formulates a nursing diagnosis through observation of the client's physical condition
23 and behavior, and through interpretation of information obtained from the client and others,
24 including the health team.

25 (2) Formulates a care plan, in collaboration with the client, which ensures that direct and
26 indirect nursing care services provide for the client's safety, comfort, hygiene, and protection, and
27 for disease prevention and restorative measures.

28 (3) Performs skills essential to the kind of nursing action to be taken, explains the health

1 treatment to the client and family and teaches the client and family how to care for the client's
2 health needs.

3 (4) Delegates tasks to subordinates based on the legal scopes of practice of the
4 subordinates and on the preparation and capability needed in the tasks to be delegated, and
5 effectively supervises nursing care being given by subordinates.

6 (5) Evaluates the effectiveness of the care plan through observation of the client's physical
7 condition and behavior, signs and symptoms of illness, and reactions to treatment and through
8 communication with the client and health team members, and modifies the plan as needed.

9 (6) Acts as the client's advocate, as circumstances require, by initiating action to improve
10 health care or to change decisions or activities which are against the interests or wishes of the
11 client, and by giving the client the opportunity to make informed decisions about health care
12 before it is provided.

13 19. California Code of Regulations, title 16, section 1444, states:

14 A conviction or act shall be considered to be substantially related to the qualifications,
15 functions or duties of a registered nurse if to a substantial degree it evidences the present or
16 potential unfitness of a registered nurse to practice in a manner consistent with the public health,
17 safety, or welfare. Such convictions or acts shall include but not be limited to the following:

18 (a) Assaultive or abusive conduct including, but not limited to, those violations listed in
19 subdivision (d) of Penal Code Section 11160.

20 (b) Failure to comply with any mandatory reporting requirements.

21 (c) Theft, dishonesty, fraud, or deceit.

22 (d) Any conviction or act subject to an order of registration pursuant to Section 290 of the
23 Penal Code.

24 **DANGEROUS DRUG/CONTROLLED SUBSTANCES**

25 20. Section 4021 of the Code states:

26 "Controlled substance" means any substance listed in Chapter 2 (commencing with Section
27 11053) of Division 10 of the Health and Safety Code.

28 21. Section 4022 of the Code states:

1 "Dangerous drug" or "dangerous device" means any drug or device unsafe for self-use,
2 except veterinary drugs that are labeled as such, and includes the following:

3 (a) Any drug that bears the legend: "Caution: federal law prohibits dispensing without
4 prescription," "Rx only," or words of similar import.

5 (b) Any device that bears the statement: "Caution: federal law restricts this device to sale by
6 or on the order of a _____," "Rx only," or words of similar import, the blank to be filled in
7 with the designation of the practitioner licensed to use or order use of the device.

8 (c) Any other drug or device that by federal or state law can be lawfully dispensed only on
9 prescription or furnished pursuant to Section 4006."

10 22. Section **4051(a)** of the Code states:

11 (a) Except as otherwise provided in this chapter, it is unlawful for any person to
12 manufacture, compound, furnish, sell, or dispense any dangerous drug or dangerous device, or to
13 dispense or compound any prescription pursuant to Section 4040 of a prescriber unless he or she
14 is a pharmacist under this chapter.

15 23. Section **4060** of the Code states:

16 No person shall possess any controlled substance, except that furnished to a person upon
17 the prescription of a physician, dentist, podiatrist, optometrist, or veterinarian, or furnished
18 pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse
19 practitioner pursuant to Section 2836.1, a physician assistant pursuant to Section 3502.1, or a
20 pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or clause (iv) of subparagraph
21 (A) of paragraph (5) of, subdivision (a) of Section 4052. This section shall not apply to the
22 possession of any controlled substance by a manufacturer, wholesaler, pharmacy, pharmacist,
23 physician, podiatrist, dentist, optometrist, veterinarian, certified nurse-midwife, nurse practitioner,
24 or physician assistant, when in stock in containers correctly labeled with the name and address of
25 the supplier or producer. Nothing in this section authorizes a certified nurse-midwife, a nurse
26 practitioner, or a physician assistant to order his or her own stock of dangerous drugs and devices.

27 24. **Vicodin**, also known as **Norco**, is a combination of acetaminophen and
28 **Hydrocodone**, a schedule III controlled substance as designated by Health and Safety Code

1 section 11056(e)(4), and a dangerous drug within the meaning of Code section 4022.

2 25. **Yaz**, also known as drospirenone and ethinyl estradiol, is a dangerous drug within
3 the meaning of Code section 4022.

4 **COSTS**

5 26. Section **125.3** of the Code provides, in pertinent part, that the Board may request the
6 administrative law judge to direct a licentiate found to have committed a violation or violations of
7 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
8 enforcement of the case.

9 **FACTUAL SUMMARY**

10 27. During 2007, 2008 and 2009, Respondent worked as a nurse practitioner for the
11 Sutter Pacific Medical Foundation's San Rafael Clinic in San Rafael, California.

12 28. At various times during 2007, 2008 and 2009, Respondent wrote prescriptions for,
13 and filled said prescriptions, for Vicodin for her daughter, who was not a patient of the San Rafael
14 Clinic and had not been examined by a physician at the clinic in relation to these prescriptions.
15 Nothing in the standardized procedures or the drug formulary at the San Rafael Clinic authorized
16 Respondent to so prescribe, obtain or furnish Vicodin. The prescriptions were written as follows:

- 17 a. On or about August 31, 2007, Respondent prescribed Vicodin, 50 tablets, for her
18 daughter. Respondent placed a check mark next to the name of Albert C. Goldberg,
19 M.D., and signed the prescription illegibly, thus creating the impression that Dr.
20 Goldberg had issued the prescription. The prescription included three re-fills.
- 21 b. On or about November 27, 2007, Respondent prescribed Vicodin, 50 tablets, for her
22 daughter. Respondent placed a check mark next to the name of Albert C. Goldberg,
23 M.D., and signed the prescription illegibly, thus creating the impression that Dr.
24 Goldberg had issued the prescription. The prescription included three re-fills.
- 25 c. On or about February 13, 2008, Respondent prescribed Vicodin, 50 tablets, for her
26 daughter. Respondent placed a check mark next to the name of Albert C. Goldberg,
27 M.D., and signed the prescription illegibly, thus creating the impression that Dr.
28 Goldberg had issued the prescription. The prescription included three re-fills.

- 1 d. On or about April 30, 2008, Respondent prescribed Vicodin, 50 tablets, for her
2 daughter. Respondent placed a check mark next to the name of Albert C. Goldberg,
3 M.D., and signed the prescription illegibly, thus creating the impression that Dr.
4 Goldberg had issued the prescription. The prescription included three re-fills.
- 5 e. On or about March 27, 2009, Respondent prescribed Vicodin, 50 tablets, for her
6 daughter. Respondent placed a check mark next to the name of Albert C. Goldberg,
7 M.D., and signed the prescription illegibly, thus creating the impression that Dr.
8 Goldberg had issued the prescription. The prescription included three re-fills.
- 9 f. On or about July 17, 2009, Respondent prescribed Vicodin, 50 tablets, for her daughter.
10 Respondent placed a check mark next to the name of Albert C. Goldberg, M.D., and
11 signed the prescription illegibly, thus creating the impression that Dr. Goldberg had
12 issued the prescription. The prescription included three re-fills. The prescription was
13 filled on July 18, 2009. The prescription was re-filled on August 11, 2009, September
14 6, 2009 and September 17, 2009.
- 15 g. On or about October 14, 2009, Respondent prescribed Vicodin, 50 tablets, for her
16 daughter. Respondent circled the name of Albert C. Goldberg, M.D., and signed the
17 prescription illegibly, thus creating the impression that Dr. Goldberg had issued the
18 prescription. The prescription included three re-fills. The prescription was filled on
19 October 14, 2009. The prescription was re-filled on November 11, 2009 and December
20 8, 2009.

21 29. At various times during 2008 and 2009, Respondent wrote prescriptions for, and
22 obtained and filled said prescriptions, for Yaz for her daughter, who was not a patient of the San
23 Rafael Clinic and had not been examined by a physician at the clinic in relation to this
24 prescription. Nothing in the standardized procedures at the San Rafael Clinic authorized
25 Respondent to so prescribe, obtain or furnish Yaz. The prescriptions were as follows:

- 26 a. On or about October 9, 2008, Respondent prescribed Yaz for her daughter. Respondent
27 placed a check mark next to the name of Albert C. Goldberg, M.D., and signed the
28 prescription illegibly, thus creating the impression that Dr. Goldberg had issued the

1 prescription. The prescription included one re-fill. The prescription was re-filled on
2 August 30, 2009 and/or on September 25, 2009.

3 b. On or about October 14, 2009, Respondent prescribed Yaz for her daughter.

4 Respondent circled the name of Albert C. Goldberg, M.D., and signed the prescription
5 illegibly, thus creating the impression that Dr. Goldberg had issued the prescription.

6 The prescription included one re-fill. The prescription was filled on October 14, 2009.

7 **FIRST CAUSE FOR DISCIPLINE**

8 (Unprofessional Conduct)

9 30. Respondent is subject to disciplinary action under section 2761(a) of the Code, as set
10 forth above in paragraphs 26-28.

11 **SECOND CAUSE FOR DISCIPLINE**

12 (Unprofessional Conduct -- Unlawful Practice of Medicine)

13 31. Respondent is subject to disciplinary action under sections 2052 and 2761(a) of the
14 Code in that she acted unprofessionally by engaging in the unlicensed practice of medicine, as set
15 forth above in paragraphs 26-28.

16 **THIRD CAUSE FOR DISCIPLINE**

17 (Gross Negligence/Incompetence)

18 32. Respondent is subject to disciplinary action under sections 2761(a)(1) and 2836.3(c)
19 of the Code in that she acted with gross negligence and incompetence, as set forth above in
20 paragraphs 26-28.

21 **FOURTH CAUSE FOR DISCIPLINE**

22 (Unlawful Possession/Furnishing of Drugs)

23 33. Respondent is subject to disciplinary action under sections 2761(a) and 2762(a) of the
24 Code in that she unlawfully obtained and possessed dangerous drugs and controlled substances
25 and prescribed and unlawfully furnished dangerous drugs and controlled substances, as set forth
26 above in paragraphs 26-28.

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1 **FIFTH CAUSE FOR DISCIPLINE**

2 (Fraudulently Obtaining Dangerous Drugs)

3 34. Respondent is subject to disciplinary action under sections 2761(a) and 2762(a) of the
4 Code and under California Code of Regulations, Title 16, section 1444, in that she engaged in
5 unprofessional conduct and engaged in dishonesty, fraud and deceit in obtaining dangerous drugs,
6 as set forth above in paragraphs 26-28.

7 **SIXTH CAUSE FOR DISCIPLINE**

8 (Impersonating Licensed Practitioner)

9 Respondent is subject to disciplinary action under section 2761(h) of the Code in that
10 she impersonated another licensed practitioner, namely Dr. Goldberg, as set forth above in
11 paragraphs 26-28.

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15 **PRAYER**

16 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
17 and that following the hearing, the Board of Registered Nursing issue a decision:

- 18 1. Revoking or suspending Registered Nurse License Number RN 557888, issued to
19 Laura Catharine Wahpepah, aka Laura Catharine Bruce;
- 20 2. Revoking or suspending Public Health Nurse Certificate No. PHN 61564, issued to
21 Laura Catharine Wahpepah, aka Laura Catharine Bruce;
- 22 3. Revoking or suspending Nurse Practitioner Certificate No. NP 12723, issued to Laura
23 Catharine Wahpepah, aka Laura Catharine Bruce;
- 24 4. Revoking or suspending Nurse Practitioner Furnishing No. NPF 12723, issued to
25 Laura Catharine Wahpepah, aka Laura Catharine Bruce;
- 26 5. Ordering Respondent to pay the Board of Registered Nursing the reasonable costs of
27 the investigation and enforcement of this case, pursuant to Business and Professions Code section
28 125.3;

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6. Taking such other and further action as deemed necessary and proper.

DATED: June 20, 2011 Louise R. Bailey
LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant